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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No.
	)
Plaintiff,	) <u>COUNT 1:</u>
	) COERCION AND ENTICEMENT
vs.	) OF A MINOR
	) Vio. of 18 U.S.C. § 2422(b) and
WILLIAM PATRICK KING,	) § 2260A
	)
Defendant.	) <u>COUNT 2:</u>
	) SEXUAL EXPLOITATION OF A
	) CHILD – PRODUCTION OF
	) CHILD PORNOGRAPHY
	) Vio. of 18 U.S.C. § 2251(a) and (e)
	) and § 2260A
	)
	) <u>COUNT 3:</u>
	) CYBERSTALKING
	) Vio. of 18 U.S.C. § 2261A
	)

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## INDICTMENT

The Grand Jury charges that:

### COUNT 1:

#### Coercion and Enticement of a Minor

On or about April 21, 2017, through May 17, 2017, in the District of Alaska and elsewhere, the defendant WILLIAM PATRICK KING, did, using a facility and means of interstate and foreign commerce, knowingly persuade, induce, entice, and coerce “JUVENILE A,” an individual who he knew had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, to wit: Production of Child Pornography, in violation of Title 18, United States Code, Section 2251(a).

In violation of Title 18, United States Code, Section 2422(b) and Section 2260A.

### COUNT 2:

#### Sexual Exploitation of a Child – Production of Child Pornography

On or about April 21, 2017, through May 17, 2017, in the District of Alaska and elsewhere, the Defendant WILLIAM PATRICK KING, did employ, use, persuade, induce, entice, and coerce “JUVENILE A,” a minor, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction will be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and

foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and has actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and Section 2260A.

COUNT 3:  
Cyberstalking

On or about April 21, 2017, through May 17, 2017, in the District of Alaska and elsewhere, the defendant WILLIAM PATRICK KING, with the intent to harass or intimidate “JUVENILE A”, knowingly used any interactive computer service or electronic communication service or electronic communication system of interstate commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to “JUVENILE A”.

In violation of 18 U.S.C. §§ 2261A(2)(B).

**SPECIAL ALLEGATION**

The Grand Jury further alleges that at the time WILLIAM PATRICK KING committed the offenses charged in Counts One through Three of the Indictment, he had been previously convicted on June 27, 2007 of a 3<sup>rd</sup> Degree

Sex Offense under CL § 3-307(A)(1) in the Baltimore County Circuit Court in the state of Maryland in case number 03K07001399, a felony offense requiring lifetime sex offender registration in that state.

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Adam Alexander  
ADAM ALEXANDER  
United States of America  
Assistant U.S. Attorney

s/ Steven E. Skrocki for  
BRYAN SCHRODER  
United States of America  
Acting United States Attorney

DATE: 7-19-17